

THE HONORABLE RONALD B. LEIGHTON

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT TACOMA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

TROY X. KELLEY,

Defendant.

Case No. 3:15-cr-05198-RBL

DEFENDANT'S UNOPPOSED
MOTION TO MOVE FUNDS HELD IN
BLOCKED TRUST ACCOUNT

**NOTED FOR:
TUESDAY, SEPTEMBER 6, 2016**

Troy Kelley hereby moves the Court for an order permitting Calfo Harrigan Leyh & Eakes LLP, now operating as Harrigan Leyh Farmer & Thomsen LLP (hereinafter, "CHLE"), to transfer the funds held by Court order from a blocked trust account held by CHLE to a blocked trust account held in the name of Mr. Kelley's counsel's new law firm, Calfo Eakes & Ostrovsky PLLC ("CE&O"). The Court had ordered the release of these funds, which had been seized by the government, to a blocked account at CHLE. Dkt. No. 99.

The transfer of funds to a new blocked account held in CE&O's trust account is appropriate because Angelo Calfo, Patty Eakes, and all other lawyers and staff who worked on

1 Mr. Kelley's defense now practice at CE&O, and no lawyer at CHLE represents Mr. Kelley.
2 Mr. Kelley consents to this transfer, as does the government and CHLE. A proposed order is
3 submitted herewith.

4 DATED this 6th day of September, 2016.

5 CALFO EAKES & OSTROVSKY PLLC

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7 By s/Angelo J. Calfo
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13 *Attorneys for Defendant Troy X. Kelley*

CERTIFICATE OF SERVICE

I hereby certify that on September 6, 2016, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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s/Susie Clifford